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Joon P. Hong  
Neil S. Binder

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:	)	Chapter 11
	)	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	)	Case No. 09-50026 (REG)
	)	
Debtors.	)	Jointly Administered

**VERIFIED STATEMENT OF RICHARDS KIBBE & ORBE LLP  
PURSUANT TO RULE 2019(a) OF THE FEDERAL  
RULES OF BANKRUPTCY PROCEDURE**

Richards Kibbe & Orbe LLP ("RK&O") submits this verified statement ("Statement") pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure and states as follows:

1. RK&O appears on behalf of the following entities (collectively, the "Entities") in the above captioned jointly administered chapter 11 cases of Motors Liquidation Company, *et al.* (collectively, the "Debtors"):

- (a) Morgan Stanley & Co. International plc  
25 Cabot Square  
Canary Wharf  
London E14 4QA  
England

(b) Goldman Sachs & Co.  
200 West Street  
New York, New York 10282

2. Each of the Entities may hold claims against and/or interests in the Debtors arising out of applicable agreements, law or equity pursuant to their relationship with the Debtors.

3. The specific nature and amounts of the claims held by each of the Entities have not yet been determined but have been set forth in proofs of claims or other pleadings filed in the Debtors' chapter 11 cases.

4. Each of the Entities separately requested that RK&O represent them in connection with the Debtors' chapter 11 cases.

5. RK&O has never held, nor does it now hold, any claims against or interests in the Debtors.

6. This Statement is filed strictly to comply with Bankruptcy Rule 2019, and nothing contained herein shall prejudice the claims, rights or remedies of RK&O or any of the Entities.

7. RK&O reserves the right to revise and supplement this Statement as appropriate.

8. The undersigned hereby verifies under oath that this Statement is true and accurate, to the best of the undersigned's knowledge and belief.

Dated: New York, New York  
January 20, 2011

RICHARDS KIBBE & ORBE LLP

/s/ Joon P. Hong

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